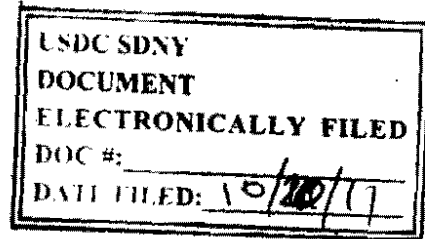


WELLS FARGO

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



IN RE: WORLD TRADE CENTER DISASTER  
SITE LITIGATION

21 MC 100 (AKH)

**STIPULATION OF DISCONTINUANCE  
AGAINST TURNER CONSTRUCTION -  
INTERNATIONAL, LLC WITHOUT  
PREJUDICE**

THIS DOCUMENT APPLIES TO ALL WORLD  
TRADE CENTER DISASTER SITE LITIGATION

IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for the undersigned, that the claims of the plaintiffs represented from the offices of Gregory J. Cannata and Associates (on the attached Exhibit "A"), (hereinafter "Plaintiffs") against Turner Construction-International, LLC (the incorrectly named Turner Defendant) be and hereby are dismissed without prejudice. As of the date of execution of this Stipulation, Plaintiffs will cease naming this entity in all Check-Off Complaints Related to the Master Complaint ("Short Form Complaints"). Plaintiffs nevertheless reserve their right to resume naming this entity in future Short Form Complaints, based on the occurrence of certain conditions as detailed below.

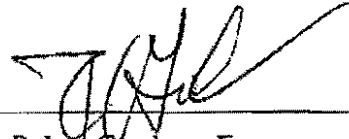
IT IS FURTHER STIPULATED AND AGREED that until such time, if ever, as the claims of Plaintiffs are dismissed against defendant Turner Construction Company, Plaintiffs may move to reinstate or state any or all claims against the Incorrectly Named Turner Defendant, based on the discovery of facts they assert support a claim against the Incorrectly Named Turner Defendant, where such facts were not provided in discovery as of the date of this Stipulation. The Incorrectly Named Turner Defendant will not raise the Statute of Limitations as a defense if

the original action was timely filed and served.

IT IS FURTHER STIPULATED AND AGREED that this Order shall constitute a dismissal with prejudice as to the claims of any or all Plaintiffs against the Incorrectly Named Turner Defendant at such time, if ever, as the claims of such Plaintiff(s) against defendant Turner Construction Company are dismissed.


Dated: New York, New York  
~~April 30~~, 2011  
August 9, 2011

LAW FIRM OF GREGORY J. CANNATA


By:   
Robert Grochow, Esq.  
Attorney for Plaintiff(s)  
233 Broadway, Fifth Floor  
New York, New York 10279  
(212) 553-9205

Dated: New York, New York  
~~April 30~~, 2011  
September

LONDON FISCHER LLP

By:   
John E. Sparling, Esq.  
Attorney for Defendants  
Turner Construction Company,  
Turner Construction Co., and  
Turner Construction-International, LLC  
59 Maiden Lane  
New York, NY 10038  
(212) 972-1000

**SO ORDERED.**

  
U.S.D.J. 10/20/11

	PLAINTIFF	INDEX NUMBER	COUNSEL
1	GIMPORTONE, JOSEPH	10 CV 6716	CANNATA
2	KOWALEWSKI, JANUSZ	10 CV 6882	CANNATA
3	KOMAR, DENNIS AND DEBORAH	10 CV 6720	CANNATA
4	KEMPLER, ROY AND KAREN	10 CV 6716	CANNATA
5	REILLY, DENNIS AND CYNTHIA	10 CV 6717	CANNATA
6	ROTHMAN, MARK AND DOREEN	10 CV 6719	CANNATA
7	HAUGHTON, RICHARD AND ERKINDA	10 CV 6881	CANNATA
8	COVAN, WILLIAM	10 CV 6715	CANNATA
9	DIRECTIE, WALDEMAR	10 CV 4225	CANNATA
10	SIENKIEWICZ, ROBERT AND BARBARA	10 CV 6711	CANNATA
11	KIRKLAND, QUENTIN	10 CV 6714	CANNATA
12	HOWEL, DEVERET	10 CV 6721	CANNATA